

Legal Notice

From:

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04/24/2024

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To:

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Rcv'd by: HE

RE: Jeffery Battle (Plaintiff) vs Microsoft Corporation (Defendant) – civil case: 1:23-cv-01822, Cease & Desist – Fifth Legal Notice to Defendant

To Attorney Brett Ingerman:

This Cease & Desist is the fifth legal notice to the defendant, is about Plaintiff, Jeffery Battle, concerning his name and business “Battle Enterprises, LLC”. Accordingly, please direct all correspondence to the Plaintiff and the United States District Court of Maryland.

Microsoft through its “Microsoft Bing” search engine and “Copilot” Artificial Intelligence (AI) functions, has engaged in the act of defaming Mr. Battle and his business, among other claims, and has propagating false information about Mr. Battle that has had substantial impacts on his personal and professional life, personal property, and livelihood. Due to Microsoft’s actions, Mr. Battle is in continuous fear for his safety and the safety of his family. For context, Mr. Battle is an author, professor, and the founder, owner, President, and Chief Executive Officer (CEO) of his company, Battle Enterprises, LLC, and its subsidiary The Aerospace Professor Company. He is a United States military veteran, and journalist, who is in the process of promoting his new autobiography entitled “The Aerospace Professor: The Man and The Brand” and intellectual property brand (Logo), among other personal and public business ventures. From May 2023 until the present, Microsoft, through their search engine Bing and other AI functions, has generated false statements conflating Mr. Battle with a person of a similar name, Jeffrey Leon Battle, who is a convicted terrorist, to the professional and personal detriment of Mr. Battle and his family. Please note that the distinction between Mr. Battle and Jeffrey Leon Battle is in the spelling of their first name and Plaintiff has no middle name.

Recently, Mr. Battle discovered that Microsoft's "Microsoft Bing" search engine and "Copilot" AI function, are generating false information connecting and associating Mr. Battle and his business "Battle Enterprises, LLC" with Jeffrey Leon Battle a convicted terrorist.

The plaintiff noticed when searching his name in Bing, a link for "Jeff Battle liability" would appear. Selecting or clicking on the link reveals a webpage that states:

1. "Battle Enterprises, LLC: Jeffrey Battle's company, Battle Enterprises, LLC, is also involved in the legal proceedings. Battle himself was sentenced to eighteen years in prison after pleading guilty to seditious conspiracy and levying war against the United States. He had two years added to his sentence for refusing to testify before a grand jury. You can read the complaint related to his case [here](#)" (emphasis added) *See Attachment A – dated 4/24/2023, pages 1 and 2.*

This information is not, as written and referenced, in "the complaint related to his (*Plaintiff's*) case [here](#)" The individual referenced in the Bing Copilot writeup, "Jeffrey Battle" is a convicted terrorist, note the spelling of the first name, and "Battle Enterprises, LLC" is not his company. The plaintiff, Jeffery Battle, is the founder, owner, President, and Chief Executive Officer (CEO) of Battle Enterprises, LLC and its subsidiary The Aerospace Professor Company, and was not "sentenced to eighteen years in prison after pleading guilty to seditious conspiracy and levying war against the United States." Battle Enterprises, LLC is not "involved in the legal proceedings" involving a convicted terrorist.

For nearly a year, Microsoft has continued numerous different types of false activities, labeling the plaintiff and his personal property as terrorist and terrorist owned. First, these reports falsely, materially, and detrimentally connect and imply that Jeffrey Leon Battle, a convicted terrorist, is Mr. Battle. Secondly, Microsoft falsely, materially, and detrimentally connected and implied that a convicted terrorist is the owner of Plaintiff's business. Third, Mr. Battle was not "sentenced to eighteen years in prison after pleading guilty to seditious conspiracy and levying war against the United States." The Plaintiff did not have "two years added to his sentence for refusing to testify before a grand jury".

These false accusations, through Bing searches, which are directly attributed to Mr. Battle and his personal property through Microsoft "Bing", have, and will continue, to severely damage Mr. Battle's professional and personal reputation, harm his personal property, and could lead to threats of violence against him and his family. While Mr. Battle has been dealing with this false attribution of facts to his name and property for nearly a year, he is attempting to promote his autobiography, intellectual property (log), and other business endeavors. In light of these false statements, Mr. Battle has ceased marketing, promotions, and business sales activities related to his new book and intellectual property, seeking Podcasts, speaking engagements, animated and non-animated movie deals, product license agreements, and other private business endeavors, to his own financial, personal, and professional detriment.

Mr. Battle attempted to go through the appropriate measures and processes to communicate with Microsoft before engaging in a civil action. In addition, the plaintiff has observed that Microsoft

Bing and the Artificial Intelligence (AI) Copilot function continue to conflate Mr. Battle's facts with Jeffery Leon Battle's facts in numerous other instances.

Evidence included with the complaint and cease-and-desist notices, that have been presented to the defendant, indicates that Microsoft cannot correct or control the AI outputs, making the software program a continuous danger to the plaintiff.

The Plaintiff has numerous years of technology experience and an engineering Bachelor of Science degree. He believes that there is AI manipulation involved. *Again, please contact the Federal Bureau of Investigation (FBI) because your numerous false and extremely different and unique activities to harm Mr. Battle appears to be human programmer-assisted and not solely Artificial Intelligence (AI) developed and generated.* The AI software should be immediately removed from public access.

As such, Plaintiff hereby demands that Microsoft immediately cease-and-desist from defaming and committing other unauthorized actions against him, remove all references to Mr. Battle that connect, conflate, or associate his identity with convicted terrorists, and remove the Bing and Copilot searches reporting Mr. Battle as a terrorist and his business as terrorist owned.

Mr. Battle is entitled to seek monetary damages and equitable relief. This is the fifth cease-and-desist notice forwarded to the defendant, and the Plaintiff has been attempting to resolve this matter through communications with the defendant since May of 2023. Plaintiff will pursue all available legal remedies, including seeking monetary damages, injunctive relief, and other relief according to the civil complaint, and new detrimental information included in all the cease-and-desist notices, which could result in considerable liability to you.

NOTE: Notice to the defendant (Microsoft). All remedies sought have failed. The plaintiff intends to seek permission from the court to file a Motion for Injunction. Please respond immediately to the Plaintiff and Maryland District Court concerning this matter and other forwarded cease-and-desist notices.

Regards,

Jeffery Battle, Plaintiff



ATTACHMENTS:

- A. Microsoft's "Bing" search; "Jeff Battle liability" - computer screenshot of false reporting connecting the plaintiff (Jeffery Battle) and his business (Battle Enterprises, LLC) to "Jeffrey Leon Battle" a convicted terrorist. Dated 4/24/2024.

NOTE: This document and attachments have been forwarded to Defendant by FedEx Next Day Delivery Mail – Signature Confirmation, with a Certificate of Service, and Hand delivered to the United States District Court of Maryland